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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

15  
16 This Document Relates to:

**STIPULATION AND ~~PROPOSED~~ ORDER  
RE TRANSLATION PROTOCOL**

17 *ALL DIRECT PURCHASER ACTIONS*

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”) and Defendants Irico Display Devices Co., Ltd. and  
2 Irico Group Corporation (together, the “Irico Defendants” or “Irico”), by and through the  
3 undersigned counsel, hereby stipulate as follows:

4 WHEREAS, the Irico Defendants have submitted several hundred pages of translated  
5 documents in connection with their two motions to dismiss filed on July 18, 2018 (ECF Nos. 5312,  
6 5313) (“Motions”);

7 WHEREAS, in many cases, only a small portion of a document is relevant to the matters at  
8 issue in the Motions;

9 WHEREAS, the parties wish to avoid the significant time and expense associated with  
10 reviewing for accuracy the portions of the translated documents not at issue, objecting to  
11 inaccuracies, and resolving those objections;

12 WHEREAS, the parties may agree on adjustments to the translation protocol, set forth in  
13 section XVI of the Court’s Order re Discovery and Case Management Protocol, ECF No. 1128  
14 (Apr. 3, 2012), to promote efficiency or fairness;

15 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between counsel  
16 for DPPs and the Irico Defendants:

17 1. DPPs will serve objections to translations relied upon in Irico’s opening briefs in a  
18 separate document on or before the due date for DPPs’ opposition to the motions to dismiss.

19 2. Irico will serve objections to translations relied upon in DPPs’ opposition briefs in a  
20 separate document on or before the due date for Irico’s reply briefs.

21 3. DPPs will serve objections to translations relied upon in Irico’s reply briefs in a  
22 separate document within thirty (30) days after Irico’s reply briefs are filed.

23 4. Objections to translations are only necessary for the relevant portions of documents  
24 upon which either party relies, with parties reserving the right to object to any other portions of the  
25 translations at a later date.

26 5. The Indirect Purchaser Plaintiffs are not required to serve initial translation  
27 objections at this time but will participate in the objection resolution process.

6. The parties will meet and confer with regard to the procedure to resolve any objections and final resolution to objections requiring approval from all parties.

Dated: October 3, 2018

/s/ R. Alexander Saveri  
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*Attorneys for Defendants Irico Group Corp.  
and Irico Display Devices Co., Ltd.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: October 9, 2018

By:   
Jon S. Tigar  
United States District Judge